

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Alexandria Division)

HANOVER INSURANCE COMPANY
and
THE HANOVER AMERICAN
INSURANCE COMPANY

Plaintiffs

v.

C. DAVID VENTURE MANAGEMENT,
LLC, VENTURE STREET, LLC,
GREAT AMERICAN INSURANCE
COMPANY,

Defendants

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* Civil Action No.: 1:21-cv-00790

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**STIPULATION OF DISMISSAL OF DEFENDANT GREAT AMERICAN INSURANCE
COMPANY WITHOUT PREJUDICE**

Plaintiffs Hanover Insurance Company and The Hanover American Insurance Company (collectively “Hanover”), and Defendant Great American Insurance Company (“Great American”), by their undersigned counsel, stipulate and agree as follows:

1. Hanover filed this action seeking a declaration that there is no insurance coverage available for the claims asserted in the putative class action lawsuit styled *In Re HomeAdvisor, Inc. Litigation*, Civil Action No. 16-CV-01849, in the United States District Court for the District of Colorado (the “HomeAdvisor Lawsuit”), under policies of insurance issued by Hanover to C. David Venture Management, LLC (“CDVM”) and Venture Street, LLC (“Venture”).

2. Great American issued Directors and Officers Liability Policy No.: DPLE319846 to Venture for policy period 05/24/2019 – 5/24/2020.

3. Great American is currently defending CDVM and Venture in the HomeAdvisor Lawsuit.

4. Great American was named as a defendant in this action pursuant to Fed.R.Civ.Pro. 19, which requires that all persons with an interest relating to the subject matter of this action be joined. Nevertheless, Great American does not wish to participate in this litigation.

5. Great American agrees that any final judgment shall be conclusive as to whether Hanover owes insurance coverage to CDVM and Venture for the HomeAdvisor Lawsuit and Great American will not seek to challenge any rulings or judgments concerning Hanover's obligations toward CDVM, Venture, or the HomeAdvisor Lawsuit.

6. Hanover agrees to dismiss Great American from this action without prejudice.



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*Attorneys for Great American Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2020, I electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record. I will also send the foregoing document and notification of such filing via electronic mail to Edward C. Carleton (ecarleton@skarzynski.com), counsel for Great American Insurance Company.

/s/
Margaret Fonshell Ward (VSB #94295)